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-and-

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UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA – NORTHERN DIVISION

In re:	§ Chapter 11
HVI CAT CANYON, INC.,	§
Debtor.	§ Case No. 9:19-bk-11573-MB
	§
	§ OMNIBUS RESPONSE TO THE
	§ EVIDENTIARY OBJECTIONS OF
	§ THE TRUSTEE AND UBS TO THE
	§ DECLARATION OF ERNESTO
	§ OLIVARES FILED IN SUPPORT OF
	§ MOTION TO APPROVE
	§ ADMINISTRATIVE CLAIMS
	§
	§ Date: May 19, 2020
	§ Time: 10:30 a.m. [PT]
	§ Place: Courtroom 201
	§ 1415 State Street
	§ Santa Barbara, California
	§

GIT, Inc., California Asphalt Production, Inc., and GTL1, LLC (“GIT”, “CAP”, “GTL”, and collectively, the “Claimants”) hereby file this response to the evidentiary objections filed by UBS AG, London Branch, UBS AG, Stamford Branch (“UBS” and the “UBS Objections”), and the chapter 11 trustee (“Trustee” and the “Trustee Objections”) [ECF 975, 977] to the Declaration of Ernesto

Olivares filed in support of the Claimants' Motion for Approval and Payment of Administrative Claims ("Motion").

RESPONSES TO TRUSTEE OBJECTIONS

#	Statement	Objection	Response
1	<p>"Those materials and services were necessary so that HVI could operate its wells. Without those materials and services HVI would have to shut down its operations, which would have made its properties unsaleable. It is my understanding that operators of oil and gas wells will often contract for similar services."</p> <p>¶ 3, lines 7-10.</p>	<p>Lack of Personal Knowledge, Fed. R. Evid. 602; Lack of Foundation, Fed. R. Evid., 602, 701, 801; Improper Opinion and Inadmissible Legal Conclusion, Fed. R. Evid. 701, 702, 703.</p>	<p>Mr. Olivares is the CFO of GIT, CAP, and GTL. He has worked in the oil and gas industry for 33 years, and has been employed by GIT, CAP, and GTL for 17 years. He thus has personal knowledge of why the materials and services were provided, and can provide admissible lay opinion testimony, based on his perceptions, of whether HVI would have to shut down operations without the services and whether oil and gas well operators will contract for similar services.</p>
2	<p>"HVI and GIT were parties to that certain Amended and Restated General & Administrative Services Agreement entered into on August 1, 2009, and amended from time to time. A true and correct copy of this agreement is attached hereto as Exhibit A."</p> <p>¶ 4, lines 11-13.</p>	<p>Best Evidence Rule (Document Speaks For Itself), Fed. R. Evid. 1002.</p>	<p>Mr. Olivares does not purport to describe the agreement. He is authenticating it, and the Trustee does not dispute that the attached exhibit is authentic. Nor can he, because it is identical to the agreement he filed in support of his motion to reject the agreement.</p>
3	<p>"HVI and CAP were parties to that certain: (a) Crude Oil Purchase Contract No. COP-002, and all amendments; (b) Crude Oil Purchase Contract No. COP-003, and all amendments; (c) Crude Oil Purchase Contract No. COP-004, and all amendments; (d) Waste Gas Handling Agreement, and all amendments; (e) Supply Agreement, and all amendments; (f) Amended and Restated Agreement, and all amendments; and (g) Supply Agreement, and all amendments. A copy of these contracts is attached hereto as Exhibit B."</p> <p>¶ 5, lines 14-20.</p>	<p>Best Evidence Rule (Document Speaks For Itself), Fed. R. Evid. 1002.</p>	<p>Mr. Olivares does not purport to describe the agreements. He is authenticating them, and the Trustee does not dispute that the attached exhibit is authentic. Nor can he, because it is identical to the agreements he filed in support of his motion to reject the agreements.</p>

1	4	<p>“HVI and GTL were parties to a trucking agreement (“Agreement”).”</p> <p>¶ 6, line 21.</p>	<p>Lack of Foundation, Fed. R. Evid., 602, 701, 801</p>	<p>Mr. Olivares is the CFO of GTL and has been employed by GTL for the last 17 years. He therefore has personal knowledge that HVI and GTL were parties to a trucking agreement. Moreover, the Trustee asserted in his motion to reject the agreement that HVI and GTL were parties to a trucking agreement.</p>
7	5	<p>“It is my understanding that the rates charged by GIT, CAP, and GTL are generally below those in the oil and gas industry.”</p> <p>¶ 7, lines 23-24.</p>	<p>Lack of Personal Knowledge, Fed. R. Evid. 602; Lack of Foundation, Fed. R. Evid., 602, 701, 801; Improper Opinion and Inadmissible Legal Conclusion, Fed. R. Evid. 701, 702, 703.</p>	<p>Mr. Olivares is the CFO of GIT, CAP, and GTL. He has worked in the oil and gas industry for 33 years, and has been employed by GIT, CAP, and GTL for 17 years. He thus has personal knowledge of the oil and gas industry, an understanding of rates generally charged in the industry, and can provide lay witness testimony based on his own perceptions.</p>
15	6	<p>“After HVI filed bankruptcy, GIT, CAP, and GTL continued to provide materials and services to HVI on the same terms as they did before HVI’s bankruptcy. If these entities had not provided materials and services to HVI, it is very likely that HVI would have to shut in its wells, which would have made its properties unsaleable.”</p> <p>¶ 9, lines 3-6.</p>	<p>Lack of Personal Knowledge, Fed. R. Evid. 602; Lack of Foundation, Fed. R. Evid., 602, 701, 801; Improper Opinion and Inadmissible Legal Conclusion, Fed. R. Evid. 701, 702, 703.</p>	<p>Mr. Olivares is the CFO of GIT, CAP, and GTL. He thus has personal knowledge of the terms of the materials and services provided to HVI by the Claimants and the terms on which they provided prepetition and postpetition materials and services. He has also worked in the oil and gas industry for 33 years, and can provide lay witness testimony about HVI needing to shut in its wells and the properties becoming unsaleable based on his perception.</p>
23	7	<p>“After his appointment, the Trustee continued to utilize the services provided by GIT, CAP, and GTL.”</p> <p>¶ 11, lines 10-11.</p>	<p>Lack of Foundation, Fed. R. Evid., 602, 701, 801.</p>	<p>Mr. Olivares is the CFO of GIT, CAP, and GTL. He has personal knowledge that the Trustee continued to utilize the services of the Claimants after his appointment.</p>
26	8	<p>“In October 2019, CAP voluntar[ily] prepaid HVI so that the Trustee could pay payroll and related expenses. That payment was not due until November 25,</p>	<p>Lack of Personal Knowledge (regarding Trustee’s</p>	<p>Mr. Olivares is the CFO of CAP and has been employed by CAP for the last 17 years. He has personal knowledge of why CAP prepaid HVI, what the Trustee</p>

1	2019.”	intent or	represented to obtain the
2	¶ 12, lines 12-13.	conduct), Fed.	prepayment, and when the
3		R. Evid. 602;	payment was due. Additionally, it
4		Lack of	is not relevant what amount was
5		Foundation,	advanced, all that is relevant is
6		Fed. R. Evid.,	that there was an advance, and that
7		602, 701, 801.	the Trustee asserted that the
8		Irrelevant/Vag	advance was in the ordinary
9		ue and	course of HVI’s business.
		ambiguous, as	Additionally, the Trustee does not
		it does not	actually dispute that CAP prepaid
		describe how	HVI.
		much was	
		advanced, if	
		anything, Fed.	
		R. Evid. 401,	
		402, 403.	
10	9	Lack of	Mr. Olivares is the CFO of GIT,
11	“I understand that the Trustee	Personal	CAP, and GTL. He has personal
12	rejected the agreements with CAP	Knowledge	knowledge that the Trustee
13	and GTL as of November 27, 2019,	(regarding	continued to utilize the services of
14	and the agreement with GIT as [of]	Trustee’s	the Claimants after rejection of the
15	December 31, 2019. However, the	intent or	agreements.
16	Trustee continued to utilize the	conduct), Fed.	
17	materials and services provided by	R. Evid. 602;	
18	these companies after those dates.	Lack of	
19	For example, he continued to	Foundation,	
	access HVI’s files on GIT’s server	Fed. R. Evid.,	
	pursuant to the parties’ agreement	602, 701, 801	
	until February 2020. He accepted		
	shipments of hot loads and soft		
	water from December 2019 to		
	January 2020. He also utilized		
	GTL’s trucking services in		
	December 2019.”		
	¶ 13, lines 14-21.		

RESPONSES TO UBS’ OBJECTIONS

#	Statement	Objection	Response
1	¶ 3. “GIT, CAP, and GTL provided materials and services to HVI before HVI filed bankruptcy. Those materials and services were necessary so that HVI could operate its wells. Without those materials and services HVI would have to shut down its operations, which would have made its properties unsaleable. It is my understanding that operators of oil and gas wells	Objections: lack of foundation, speculative (FRE 602), inadmissible opinion, conclusory (FRE 701). The	Mr. Olivares is the CFO of GIT, CAP, and GTL. He has worked in the oil and gas industry for 33 years, and has been employed by GIT, CAP, and GTL for 17 years. He thus has personal knowledge of why the materials and services were provided, and can provide admissible lay opinion testimony, based on his perception, of whether HVI would have to shut

1		will often contract for similar services.”	Declaration fails to establish foundation for Mr. Olivares’ knowledge regarding whether the shut down of operations would make the Debtor’s properties unsaleable and whether other oil and gas operators will contract for similar services	down operations without the services, whether shut down would make the properties unsaleable, and whether oil and gas well operators will contract for similar services.
2	2	¶ 4. “HVI and GIT were parties to that certain Amended and Restated General & Administrative Services Agreement entered into on August 1, 2009, and amended from time to time. A true and correct copy of this agreement is attached hereto as Exhibit A.”	Objection: lack of foundation (FRE 602).	Mr. Olivares is the CFO of GIT, CAP, and GTL and has been employed by GIT, CAP, and GTL for 17 years. He has the ability to authenticate GIT’s agreement with HVI. Moreover, UBS does not object to the authenticity of the agreement, since it is identical to the agreement the Trustee filed in support of his motion to reject the agreement that UBS required as a condition of its DIP loans to the Trustee.
3	3	¶ 5. “HVI and CAP were parties to that certain: (a) Crude Oil Purchase Contract No. COP-002, and all amendments; (b) Crude Oil Purchase Contract No. COP-003, and all amendments; (c) Crude Oil Purchase Contract No. COP-004, and all amendments; (d) Waste Gas Handling Agreement, and all amendments; (e) Supply Agreement, and all amendments; (f) Amended and Restated Agreement, and all amendments; and (g) Supply Agreement, and all amendments. A copy of these contracts is attached hereto as Exhibit B.”	Objection: lack of foundation (FRE 602).	Mr. Olivares is the CFO of GIT, CAP, and GTL and has been employed by GIT, CAP, and GTL for 17 years. He has the ability to authenticate CAP’s agreement with HVI. Moreover, UBS does not object to the authenticity of the exhibit, since it is identical to the agreements the Trustee filed in support of his motion to reject the agreements that UBS required as a condition of its DIP loans to the Trustee.

1	4	¶ 6. "HVI and GTL were parties to a trucking agreement ("Agreement")."	Objections: hearsay (FRE 801); lack of foundation (FRE 602).	Mr. Olivares is the CFO of GTL and has been employed by GTL for the last 17 years. He therefore has personal knowledge that HVI and GTL were parties to a trucking agreement.
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5	5	¶ 7. "It is my understanding that the rates charged by GIT, CAP, and GTL are generally below those in the oil and gas industry."	Objections: speculative, lack of foundation (FRE 602); hearsay (FRE 801, 802); inadmissible opinion, conclusory (FRE 701). This statement is based on speculation and not supported by the requisite personal knowledge or foundation. There is no evidence in the record related to the rates charged in the oil and gas industry or Mr. Olivares' knowledge related thereto.	Mr. Olivares is the CFO of GIT, CAP, and GTL. He has worked in the oil and gas industry for 33 years, and has been employed by GIT, CAP, and GTL for 17 years. He thus has personal knowledge of the oil and gas industry, an understanding of rates generally charged in the industry, and can provide lay witness testimony based on his own perception.
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21	6	¶ 9. "After HVI filed bankruptcy, GIT, CAP, and GTL continued to provide materials and services to HVI on the same terms as they did before HVI's bankruptcy. If these entities had not provided materials and services to HVI, it is very likely that HVI would have to shut in its wells, which would have made its properties unsaleable."	Objections: speculative, lack of foundation (FRE 602), hearsay (FRE 801, 802), inadmissible opinion, conclusory (FRE 701). This statement is based on speculation, and not	Mr. Olivares is the CFO of GIT, CAP, and GTL. He has worked in the oil and gas industry for 33 years, and has been employed by GIT, CAP, and GTL for 17 years. He thus has personal knowledge of the oil and gas industry, and whether shutting in wells can make properties unsaleable, and can provide lay witness testimony based on his own perception.
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1			supported by the requisite showing of personal knowledge or foundation. The Declaration fails to establish foundation for Mr. Olivares' knowledge regarding whether the shut down of operations would make the Debtor's properties unsaleable.	
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12	7	¶ 11. "After his appointment, the Trustee continued to utilize the services provided by GIT, CAP, and GTL."	Objections: lack of foundation (FRE 602); hearsay (FRE 801, 802).	Mr. Olivares is the CFO of GIT, CAP, and GTL and has been employed by those entities for the last 17 years. He has personal knowledge that the Trustee continued to utilize the services of the Claimants after his appointment. Moreover, there is no hearsay because there is no out of court statement.
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18	8	¶ 12. "In October 2019, CAP voluntar[ily] prepaid HVI so that the Trustee could pay payroll and related expenses. That payment was not due until November 25, 2019."	Objections: lack of foundation (FRE 602); hearsay (FRE 801, 802).	Mr. Olivares is the CFO of CAP and has been employed by CAP for the last 17 years. He has personal knowledge of why CAP prepaid HVI, what the Trustee represented in its motion to approve the prepayment, and when the payment was due. Additionally, the statement by the Trustee about why he needed the prepayment is an admission of a party opponent and therefore not hearsay.
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25	9	¶ 13. "I understand that the Trustee rejected the agreements with CAP and GTL as of November 27, 2019, and the agreement with GIT as [of] December 31, 2019. However, the Trustee continued to utilize the materials and services provided by	Objections: speculative, lack of foundation (FRE 602); hearsay (FRE 801, 802); inadmissible	Mr. Olivares is the CFO of CAP and has been employed by CAP for the last 17 years. He has personal knowledge of the materials and services provided by those entities. To the extent that the Trustee's acceptance of services is an out of court
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1		these companies after those dates. For example, he continued to access HVI's files on GIT's server pursuant to the parties' agreement until February 2020. He accepted shipments of hot loads and soft water from December 2019 to January 2020. He also utilized GTL's trucking services in December 2019."	opinion, conclusory (FRE 701). This statement is based on speculation and not supported by the requisite showing of personal knowledge or foundation.	statement (which it is not), such statement is an admission by a party opponent, which is not hearsay.
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9	10	¶ 14. "Neither HVI nor the Trustee have paid GIT, CAP, or GTL for any of the materials or services provided by those entities after HVI filed bankruptcy."	Objections: speculative, lack of foundation (FRE 602); hearsay (FRE 801, 802); inadmissible opinion, conclusory (FRE 701). This statement is based on speculation and not supported by the requisite personal knowledge or foundation. There is no evidence regarding payments made by the Debtor or Trustee since the Petition Date.	Mr. Olivares is the CFO of GIT, CAP, and GTL and has been employed by those entities for the last 17 years. He has personal knowledge of what has and has not been paid to those entities after HVI filed bankruptcy. Moreover, there is no hearsay because there is no out of court statement.
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24	11	¶ 15. "GIT, CAP, and GTL sent monthly invoices to HVI and later, the Trustee. A true and correct copy of those invoices are attached hereto as Exhibit C."	Objections: lack of foundation (FRE 602); hearsay (FRE 801, 802).	Mr. Olivares is the CFO of GIT, CAP, and GTL and has been employed by those entities for the last 17 years. He has personal knowledge of what invoices were sent to HVI and the Trustee. Moreover, the Trustee (who is the representative of the estate) has not objected to this statement, nor
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1			does he dispute the fact that the Claimants sent monthly invoices to HVI and later the Trustee.
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3	12	Objectionable Evidence: Exhibit C to Olivares Declaration (Invoices).	<p>Objections: lack of foundation (FRE 602); hearsay (FRE 801, 802).</p> <p>The Declaration attaches a number of invoices that are inadmissible as hearsay. The Declaration does not cure the hearsay problem—they are offered for the contents therein, but no business records foundation is provided; there is no indication that Mr. Olivares can testify to the accuracy of the invoices or how they were prepared.</p>
4			Mr. Olivares is the CFO of GIT, CAP, and GTL and has been employed by those entities for the last 17 years. He has personal knowledge of the invoices sent by GIT, CAP, and GTL, and therefore can authenticate them without a business records declaration. Moreover, the Trustee (who is the representative of the estate) has not objected to the exhibits themselves on any grounds.
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21	13	¶ 16. “To the best of my knowledge, GIT, CAP, and GTL have not received any objections, formal or informal, to the amounts billed in the invoices.”	<p>Objections: speculative, lack of foundation (FRE 602); hearsay (FRE 801, 802); inadmissible opinion, conclusory (FRE 701).</p> <p>This statement is based on speculation and not</p>
22			Mr. Olivares is the CFO of GIT, CAP, and GTL. He states that to the best of knowledge, GIT, CAP, and GTL have not received any objections to the amounts billed in the invoices. This statement is based on his own knowledge.
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supported by
the requisite
personal
knowledge or
foundation.
There is no
evidence in the
record related
to whether the
Debtor or
Trustee
objected to the
amounts billed
in the invoices.

DATED: May 12, 2020

Respectfully submitted,

QUINN EMANUEL URQUHART & SULLIVAN LLP

By: /s/ Razmig Izakelian
Patricia B. Tomasco
Razmig Izakelian

Attorneys for GIT, Inc., California Asphalt Production,
Inc., and GTL1, LLC

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
865 S. Figueroa Street, 10th Floor, Los Angeles, CA 90017

A true and correct copy of the foregoing document entitled (*specify*): OMNIBUS RESPONSE TO THE EVIDENTIARY
OBJECTIONS OF THE TRUSTEE AND UBS TO THE DECLARATION OF ERNESTO OLIVARES FILED IN SUPPORT
OF MOTION TO APPROVE ADMINISTRATIVE CLAIMS

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) 05/12/2020, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

05/12/2020 Razmig Izakelian
Date Printed Name

/s/ Razmig Izakelian
Signature

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)

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